

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA	)	
RIBEIRO, as individuals and as next	)	CASE NO. 8:12cv204
friends and biological parents of	)	
LUCAS RIBEIRO, an infant,	)	
	)	
Plaintiffs,	)	<b>STIPULATED</b>
	)	<b>PROTECTIVE ORDER</b>
vs.	)	
	)	
BABY TREND, INC.,	)	
	)	
Defendant.	)	

Pursuant to the parties' Stipulation for Protective Order ([filing 38](#)),

**IT IS HEREBY ORDERED:**

- a. That all documents and information responsive to Plaintiffs' requests for production of documents, requests 1 through 12, inclusive shall be considered "Confidential Documents" and "Confidential Information" and disclosed only to the parties to this litigation, the attorneys for the parties, consultants or experts specially retained or specially employed for purposes of this litigation and maintained and retained in accordance with subparagraph (d) below. All "Confidential Documents" and "Confidential Information" to include documents and information disclosed in digital formats such as CD's and DVD's shall be labeled and identified as "Confidential and Restricted Subject to Stipulated Protective Order."

- b. The parties and their consultants or experts specially retained or specially employed for purposes of this litigation are to use Confidential Documents and Confidential Information solely and exclusively in connection with this litigation.
- c. No copies of any Confidential Documents or Confidential Information disclosed will be made except as necessary for the purposes of the litigation. If it becomes necessary to use such Confidential Documents and Confidential Information in any filing with this Court, then any such filing shall be made under seal.
- d. Upon resolution of this litigation, all documents disclosed pursuant to this Order, and all copies thereof, shall be destroyed or returned to the producing party by the party in possession of the documents. To the extent any such documents were used by the parties' consultants or experts specially retained or specially employed for purposes of this litigation, as allowed under this Order, each expert witness or consultant shall be advised of the provisions of this Order, and destroy, purge or return all documents to the producing party upon conclusion of the litigation.

This Stipulated Protective Order shall protect trade secrets, confidential research, development and commercial information, while allowing Plaintiffs necessary freedom to investigate, review and analyze documents and information relevant to Defendant's infant car seats subject to product liability theories in the subject litigation.

**DATED April 23, 2013.**

**BY THE COURT:**

**S/ F.A. Gossett  
United States Magistrate Judge**